Michael O. Leavitt
Governor
Douglas C. Borba
Executive Director
Ric Campbell
Division Director

State of Utah

DEPARTMENT OF COMMERCE
DIVISION OF PUBLIC UTILITIES
Heber M Wells Bldg., 4th Floor
160 East 300 South / Box 146751
Salt Lake City, UT 84114-6751

Telephone No.: (801) 530-6651
FAX: (801) 530-6512 **OR** (801) 530-6650

VIA UPS Next DAY AIR

July 3, 1996

Mr. William F. Catton, Acting Secretary
Federal Communications Commission
Room 222
1919 M. Street, NW
Washington, D.C. 20554

Re: CC Docket No. 96-98

Dear Mr. Catton,

Please find enclosed an original and four copies of the comments of the Utah Division of Public Utilities in this Docket.

Sincerely,

Ingo Henningsen
Technical Consultant

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of The FCC's	)	
Local Competition Proceeding.	)	CC Docket No. 96-98
Industry Demand and Supply	)	
Simulation Model	)	

COMMENTS OF:
STATE OF UTAH DIVISION OF PUBLIC UTILITIES

Laurie Noda Esq.
Assistant Attorney General
Utah Division of Public Utilities
160 East 300 South
P O Box 45807
Salt Lake City, Utah 84145-0807

The Utah Division of Public Utilities respectfully submits its comments in response to the FCC Staff's "Industry Demand and Supply Simulation Model."

The Utah Division of Public Utilities (DPU), under the Utah State Department of Commerce, is a separate entity from the Utah Public Service Commission (PSC). The DPU functions as the investigative staff of the PSC and is charged with the responsibility of investigating matters before the PSC, and presenting evidence and recommendations to the PSC.

The DPU obtained an electronic copy of the model on June 21 by downloading it from the FCC's Internet Home Page. Since that time DPU staff members have been working to attempt to operate and analyze the model. To this point DPU staff has been unable to even start the model, let alone perform any detailed testing or analysis of the model. The DPU's remarks must therefore be limited to the mechanics of trying to run the model.

The DPU was unable to obtain, and is unaware of the existence of any documentation supporting the operation or construction of the model. No model of this type, implemented with a spreadsheet, should be released for evaluation in so short a period of time without clearly documented program entry or starting point situations. For example, the model calls for user entry of an extremely large number of variables, some of which are hard to define. The user needs to know the vector of information which is necessary to begin the program operation. Moreover, the product should be accompanied by several segments of documentation. First, it should

include a detailed set of instructions suitable to a user of spreadsheets in general, not necessarily Lotus. Second, there should be a data dictionary setting forth the variables, their definitions, and their points of manifestation in the spreadsheet(s). Third, the theoretical foundations of the model should be set forth with references to the points of implementation in the spreadsheet(s).

Further, The DPU recommends that some simple database and simulation theory be employed in this model, whereby the basic units of the model are defined along with their attributes (e.g. customer and customer bill, CLEC's and their charges, IXCs and services offered, etc.). Most simulations involve basic units or transactions flowing through an environment, allowing the attributes of the units to be changed in response to their experience with the environment, with a final reporting of the attributes at the end of the simulation.. No such simulation ideas or constructs were found by DPU staff in their limited review of the model. Moreover, the restrictive number of carriers apparently allowed by the model might not produce realistic results.

Although this type of modeling process may be of some future benefit. It is impossible, at this time, for the DPU to support the use of the FCC Staff's model for any purpose.